

1 ROBERT M. SEINES
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7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 JODY L. WALLETTTE,

13 Defendant.

Case No. 2:23-CR-22-RMP

MOTION TO CONTINUE
PRETRIAL CONFERENCE
AND JURY TRIAL

14 COMES NOW the defendant, JODY L. WALLETTTE, by and through his
15 attorney, Robert M. Seines, and moves the Court for an order continuing the
16 pretrial conference and jury trial dates. This motion is based on the court file
17 and the annexed declaration of counsel.

18 RESPECTFULLY SUBMITTED this 25th day of April, 2023.

19
20 By: /s/ Robert M. Seines
21 Robert M. Seines, WSBA No. 16046
22 Attorney for Jody L. WalleTTte
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MOTION AND DECLARATION TO
CONTINUE PRETRIAL CONFERENCE
AND JURY TRIAL

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1. I am the attorney for defendant, JODY L. WALLETTTE I was appointed on March 20, 2023 A pretrial conference and motion hearing is set for May 16, 2023. The jury trial date is May 30, 2023. The motions deadline is April 25, 2023.

Given the nature of this case and the penalties Mr. Wallethe is facing, the interests of justice will be best served by continuing the trial. A thorough review of the discovery and research must be completed before Mr. Wallethe will have sufficient information to make informed decisions relating to his case. Counsel cannot adequately or fully advise Mr. Wallethe on matters pertaining to trial without further investigation, research, and discussions.

MOTION AND DECLARATION TO CONTINUE PRETRIAL CONFERENCE AND JURY TRIAL

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1 3. Mr. Wallette agrees with this continuance after having been advised
2 of his speedy trial rights. I have not yet conferred with AUSA Caitlin
3 Baunsgard.
4

5 FOR THE FOREGOING REASONS, Jody L. Wallette respectfully
6 requests that this Court grant his motion to extend the current deadlines for a
7 period of at least sixty (60) days.

8 Signed this 25th day of April, 2023 at Spokane, Washington.

9 /s/ Robert M. Seines
10 ROBERT M. SEINES, WSBA 16046
11 Attorney for Defendant, Jody L. Wallette
12

13 **CERTIFICATE OF SERVICE**
14

15 I hereby certify that on April 25, 2023 I electronically filed the foregoing
16 with the Clerk of Court using the CM/ECF System which will send notification
17 of such to: Caitlin Baunsgard, Assistant U.S. Attorney
18

19 /s/ Robert M. Seines
20 ROBERT M. SEINES, WSBA 16046
21 Attorney for Defendant, Jody L. Wallette
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